

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	
)	
Total Call Mobile, Inc.)	WC Docket No. 09-197
)	
Petition for Limited Designation as)	
An Eligible Telecommunications)	
Carrier in Alabama, Connecticut, Delaware,)	
the District of Columbia, Florida,)	
New Hampshire, New York, North Carolina,)	
Tennessee, and Virginia)	
)	

REPLY COMMENTS OF TOTAL CALL MOBILE, INC.

Total Call Mobile, Inc. (“TCM” or the “Company”), by and through its attorneys, and pursuant to the Wireline Competition Bureau’s Public Notice (“Notice”),¹ submits these Reply Comments in support of its Petition for Limited Designation as An Eligible Telecommunications Carrier (“*ETC Petition*”) referenced in the above-captioned proceeding.² TCM seeks limited ETC designation for the purpose of receiving support from the universal

¹ See Public Notice, Wireline Competition Bureau Seeks Comment on Petitions for Designation as a Low-Income Eligible Telecommunications Carrier Filed by Q Link, Total Call and True Wireless, DA 12-677 (WCB April 27, 2012).

² See *In re: Telecommunications Carriers Eligible to Receive Universal Service Support; Total Call Mobile, Inc. Petition for Limited Designation as An Eligible Telecommunications Carrier In Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia*, WC Docket No. 09-197 (filed Mar. 16, 2012) (“*ETC Petition*”).

service fund's ("USF") Lifeline program. No initial comments regarding TCM's *ETC Petition* were filed in response to the Bureau's Notice. Because TCM meets the requirements for the requested ETC designation and no objections have been filed, the Commission should expeditiously grant TCM's *ETC Petition*.

I. TCM SATISFIES THE REQUIREMENTS FOR ETC DESIGNATION

TCM is a mobile virtual network operator ("MVNO") that provides wireless mobile phone services to consumers nationwide by reselling the services of Sprint PCS.³ TCM seeks limited ETC designation in the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, Virginia and the District of Columbia (the "Federal ETC States") for the provision of wireless telecommunications services supported by the Lifeline program.⁴

TCM's *ETC Petition* demonstrated that the Company meets all of the statutory and regulatory requirements for designation as an ETC. Among other things, the Company certified it would comply with the service requirements applicable to the Lifeline support it received and provided a detailed description of how its service offerings met the Lifeline service requirements.⁵ It also demonstrated its compliance with the E911 requirements and its adherence to the consumer protection and service quality standards followed by other approved ETC

³ TCM sought, and was granted, forbearance from the "own facilities" requirement for purposes of receiving Lifeline support. *See In re: Lifeline and Link Up Reform and Modernization*, FCC 12-11, ¶ 368, n.982 (Feb. 6, 2012) ("Lifeline Reform Order").

⁴ Each of the Federal ETC States has declined jurisdiction over ETC designation. Accordingly, this Commission has jurisdiction to grant TCM's request. 47 U.S.C. § 214(e)(6).

⁵ *ETC Petition* at 5-8.

applicants.⁶ Moreover, on May 25, 2012, TCM received approval of its Compliance Plan, a crucial step in the ETC designation process.⁷

After a reasonable opportunity for public comment, no party has challenged TCM's showing of compliance with the requirements for ETC designation. The Commission should quickly complete its review and conclude that TCM, indeed, meets the requirements for ETC designation.

II. PROMPT GRANT OF TCM'S ETC PETITION IS IN THE PUBLIC INTEREST

Grant of TCM's *ETC Petition* would advance the Act's goal of ensuring all consumers have access to quality telecommunications services at affordable prices. Designation of TCM as an ETC would increase consumer choice and the number of affordable telecommunications service options available to low-income consumers.

The majority of TCM's non-Lifeline wireless telecommunications service products and plans already are geared toward servicing lower-income consumers.⁸ TCM offers prepaid wireless services, which enable consumers to obtain quality telecommunications services while, at the same time, anticipating and controlling their costs.⁹ Prepaid service also is mobile – it may be used anywhere in the Sprint footprint. This mobility is especially attractive to low-income consumers that frequently may change residences or work in migratory jobs.¹⁰ Moreover TCM does not impose credit checks or require long term contracts.¹¹ The lack of a required

⁶ *Id.*

⁷ See Public Notice, FCC Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call, DA 12-828 (WCB May 25, 2012).

⁸ *ETC Petition* at 2.

⁹ *ETC Petition* at 13.

¹⁰ *ETC Petition* at 12.

¹¹ *ETC Petition* at 2-3, 13.

credit check for Lifeline and prepaid services provides credit-challenged consumers with an alternative to the credit requirements often imposed by traditional carriers for post-paid services.¹²

Upon approval of its ETC petition, TCM will be able to expand these services to offer a variety of attractive prepaid wireless plans that provide 150-250 minutes each month, a telephone (supplied for free by TCM), customer service calls, Voicemail, Caller ID, access to 911 and balance inquiries, all at no charge to Lifeline-eligible consumers.¹³ Introduction of these service offerings will provide Lifeline-eligible consumers with better access to telecommunications service and more choices. In addition, TCM's expertise in selling services in low-income markets will increase the availability of Lifeline services to the very people that the program is designed support. Accordingly, the Commission should approve the ETC petition without delay.

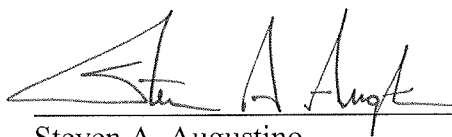
¹² *ETC Petition* at 13.

¹³ *ETC Petition* at 6. *See also ETC Petition*, Exhibit C - Sample Lifeline Brochure.

III. CONCLUSION

As discussed above, and in greater detail in its *ETC Petition*, TCM meets the requirements for ETC designation. No party has raised objection to grant of TCM's petition. Therefore, TCM requests the Commission grant its petition expeditiously so that TCM may begin bringing the benefits of its Lifeline service offerings to low-income consumers in the designated states.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven A. Augustino", is written over a horizontal line.

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